



Office of the Attorney General  
Douglas B. Moylan  
Attorney General of Guam  
Solicitors Division  
Guam Judicial Center, Suite 2-200E  
120 West O'Brien Drive  
Hagåtña, Guam 96910 USA  
(671) 475-3324 (671) 472-2493 (Fax)  
www.guamattorneygeneral.com law@mail.justice.gov.gu

Attorneys for Respondents

**FILED**  
DISTRICT COURT OF GUAM  
JAN 24 2005  
MARY L.M. MORAN  
CLERK OF COURT

138

**IN THE DISTRICT COURT OF GUAM  
TERRITORY OF GUAM**

JULIE BABAUTA SANTOS,

Petitioner,

vs.

FELIX P. CAMACHO, Governor of Guam,  
et al.,

Respondents.

CIVIL CASE NO. CV04-00006

**RESPONDENTS' LIST OF EXHIBITS**

<u>EXHIBIT</u>	<u>DESCRIPTION</u>	<u>NOT ADMITTED</u>	<u>ADMITTED</u>
A	Tax documents, 1998 income tax return of Joeday Budomo.		
B	Form 8821 (Tax Information Authorization), Form 4507 (Request for Transcript of Tax Return) signed by Joeday Budomo, dated January 19, 2005.		

<u>EXHIBIT</u>	<u>DESCRIPTION</u>	<u>NOT ADMITTED</u>	<u>ADMITTED</u>
C	Letter of Stephen A. Cohen, Assistant Attorney General, to Artemio B. Ilagan, Director of Department of Revenue and Taxation, dated January 19, 2005 re: Joey Budomo.		
D	Settlement Agreement, dated June 14, 2004, <i>Santos v. Camacho, et al.</i> , District Court of Guam Civ. No. 04-00006.		
E	Stipulated Order Granting Preliminary Approval of Class Action Settlement, June 17, 2004, <i>Santos v. Camacho et al.</i> , District Court of Guam Civ. No. 04-00006.		
F	Letter to Vice-Speaker Frank B. Aguon, Jr., dated July 14, 2004.		
G	Civil Minutes, July 16, 2004, <i>Santos v. Camacho, et al.</i> , District Court of Guam, Civ. No. 04-00006.		
H	Memorandum from Lourdes M. Perez, Director of the Department of Administration, to Douglas B. Moylan, Attorney General of Guam, dated July 20, 2004.		
I	Memorandum of Lourdes M. Perez, Director of the Department of Administration To Governor Felix P. Camacho, dated July 22, 2004.		
J	Fax transmittal sheet together with attached Draft Administration Plan submitted by the Department of Revenue and Taxation to Attorney General Douglas B. Moylan, dated July 29, 2004.		

<u>EXHIBIT</u>	<u>DESCRIPTION</u>	<u>NOT ADMITTED</u>	<u>ADMITTED</u>
K	Memorandum of Assistant Attorney General Stephen A. Cohen to Felix P. Camacho c/o Shannon Taitano, Esq., Lourdes M. Perez and Artemio B. Ilagan, dated September 9, 2004.		
L	Memorandum of Assistant Attorney General Stephen A. Cohen to Artemio Ilagan, Director And John Camacho, Deputy Director, Department of Revenue and Taxation, dated September 15, 2004.		
M	Memorandum of Assistant Attorney General Stephen A. Cohen to Felix P. Camacho c/o Shannon Taitano, Esq., Lourdes M. Perez and Artemio B. Ilagan, dated September 17, 2004.		
N	Letter to Shannon Taitano, Esq. to Assistant Attorney General Stephen A. Cohen, dated September 16, 2004.		
O	Letter from Lourdes M. Perez, Director of the Department of Administration, to Assistant Attorney General Stephen A. Cohen, dated September 20, 2004.		
P	Memorandum from Artemio B. Ilagan, Director of the Department of Revenue and Taxation, to Assistant Attorney General Stephen A. Cohen, dated September 21, 2004.		
Q	Letter from Shannon Taitano, Esq. to Assistant Attorney General Stephen A. Cohen, dated October 7, 2004.		
R	Memorandum of Deputy Attorney General Charles Troutman to Attorney General Douglas B. Moylan, dated October 13, 2004.		

<u>EXHIBIT</u>	<u>DESCRIPTION</u>	<u>NOT ADMITTED</u>	<u>ADMITTED</u>
S	Memorandum of Assistant Attorney General Stephen A. Cohen to Shannon Taitano, Artemio B. Ilagan and Lourdes M. Perez, dated October 27, 2004.		
T	Letter of Assistant Attorney General Stephen A. Cohen to Michael F. Phillips, Esq., dated October 27, 2004.		
U	Letter of Shannon Taitano, Esq. to Assistant Attorney General Stephen A. Cohen, dated October 29, 2004.		
V	Letter of Douglas B. Moylan, Attorney General, to Shannon Taitano, Esq., dated November 5, 2004.		
W	Letter of Felix P. Camacho, Governor of Guam, to Senator Vicente C. Pangelinan, Speaker of the 27 <sup>th</sup> Guam Legislature, dated November 16, 2004.		
X	Declaration of Artemio B. Ilagan, dated November 24, 2004, <i>Santos v. Camacho, et al.</i> , District Court of Guam, Civ. No. 04-00006.		
Y	Declaration of Joseph C. Manibusan, dated November 24, 2004, <i>Santos v. Camacho, et al.</i> , District Court of Guam, Civ. No. 04-00006.		
Z	Declaration of Lourdes M. Perez, dated November 24, 2004, <i>Santos v. Camacho, et al.</i> , District Court of Guam, Civ. No. 04-00006.		
AA	Letter of Artemio B. Ilagan, Director of Department of Revenue and Taxation, To Douglas B. Moylan, Attorney General, dated December 8, 2004.		

<u>EXHIBIT</u>	<u>DESCRIPTION</u>	<u>NOT ADMITTED</u>	<u>ADMITTED</u>
BB	Letter to Lourdes M. Perez, Director of The Department of Administration, to Douglas B. Moylan, Attorney General, dated December 9, 2004.		
CC	Letter of Douglas B. Moylan, Attorney General, to Artemio B. Ilagan, Director of Department of Administration, dated December 13, 2004.		
DD	Letter to Douglas B. Moylan, Attorney General, to Lourdes M. Perez, Director Of Department of Administration, dated December 13, 2004.		
EE	Memorandum of Points and Authorities in Opposition to Attorney General's Brief, dated November 24, 2004, <i>Santos v. Camacho, et al.</i> , District Court of Guam, Civ. No. 04-00006, filed by Calvo & Clark		
FF	Amended Memorandum of Points and Authorities in Support of Opposition to Petitioner's Motion for Approval of Administrative Plan, dated November 29, 2004, filed by Calvo & Clark, <i>Santos v. Camacho, et al.</i> , District Court of Guam, Civ. No. 04-00006.		
GG	Exhibit Executive Order No. 2005-01, Relative to Filing Earned Income Tax Credit Claims with the Department of Revenue and Taxation, dated January 12, 2005.		
HH	(1) Letter of S. Cohen to Office of Governor, dated January 4, 2005, re: Sunshine Act request; (2) responsive Letter of S. Taitano to S. Cohen, dated January 10, 2005.		

<u>EXHIBIT</u>	<u>DESCRIPTION</u>	<u>NOT ADMITTED</u>	<u>ADMITTED</u>
II	(1) Letter of W. Weinberg to Dept. of Revenue & Taxation, dated January 4, 2005, re: Sunshine Act request; (2) responsive letter of A. Ilagan to R. Weinberg, dated January 10, 2005.		
JJ	(1) Letter of S. Cohen to Dept. of Administration, dated January 4, 2005, re: Sunshine Act request; (2) responsive letter of L. Perez to S. Cohen, dated January 10, 2004 [sic].		
KK	Multiple documents relating to the Procurement of attorney Rawlen Mantanona to provide legal services in Artemio B. Ilagan, Director of the Department of Revenue and Taxation, and Lourdes M. Perez, Director of the Department of Administration, in the Case of <i>Santos v. Camacho, et al.</i> , District Court of Guam, Civ. No. 04-00006.		
LL	(1) Amendment to the Agreement for Professional Services between the Government of Guam and Calvo and Clark, LLP (Conflicts Counsel Agreement), unexecuted; (2) Agreement for Professional Services between the Government of Guam and Calvo and Clark, LLP (Conflicts Counsel Agreement), unexecuted.		
MM	Multiple documents relating to press releases and press briefings of the Governor of Guam regarding the EITC in 2004 and 2005.		
NN	Press release relating to EITC, dated November 10, 2004.		

<u>EXHIBIT</u>	<u>DESCRIPTION</u>	<u>NOT ADMITTED</u>	<u>ADMITTED</u>
OO	Memorandum of Points and Authorities in Response to Petitioner's Motion for Orders Approving Administration Plan, Etc. dated November 8, 2004, filed by Attorney General's Office, in <i>Santos v. Camacho, et al</i> , District Court of Guam, Civ. No. 04-00006.		
PP	Request for Hearing and Objection, etc., dated November 9, 2004, filed by Calvo & Clark, in <i>Santos v. Camacho, et al</i> , District Court of Guam, Civ. No. 04-00006.		
QQ	Memorandum of Points and Authorities in Support of the Governor of Guam's Motion to Dismiss, dated October 28, 2004, filed by Calvo & Clark in <i>Torres v. Government of Guam, Camacho, et al</i> , District Court of Guam, Civ. No. 04-00038.		
RR	Pacific Daily News, GovGuam to Pay Credit, dated February 14, 2004.		
SS	Pacific Daily News, Tax Credit may be Paid Out, dated June 11, 2004.		
TT	Pacific Daily News, Residents file for 1998 Tax Credit, dated June 12, 2004.		
UU	Pacific Daily News, EITC Settlement Reached, dated June 14, 2004.		
VV	KUAM Printable News, Governor, AG continue Battle over Roles – this time in regards to EITC, dated November 11, 2004.		
WW	Pacific Daily News, Governor files suit to halt EITC settlement, dated November 27, 2004.		
XX	KUAM Printable News, Governor may Freeze EITC Payments until Settlement Issue Resolved, dated December 1, 2004.		

<u>EXHIBIT</u>	<u>DESCRIPTION</u>	<u>NOT ADMITTED</u>	<u>ADMITTED</u>
YY	Pacific Daily News, Taxpayers can file EITC, dated December 30, 2004.		
ZZ	Pacific Daily News, Rev & Tax ordered to Take Claims for EITC, dated January 13, 2005.		
AAA	48 U.S.C. §1421i(h), Organic Act of Guam.		
BBB	5 G.C.A. §22401, Illegal Expenditures.		
CCC	Relevant provisions, Guam Procurement Law, 5 G.C.A., Chapter 5.		
DDD	Relevant provisions, Guam Procurement Regulations.		
EEE	5 G.C.A. §22601, Execution of Contracts.		
FFF	Relevant portions of Section 6103 and 7213, Internal Revenue Code (26 U.S.C. §6103 & §7213).		
GGG	Consent Decree, dated February 11, 2004, <i>United States of America v. Government of Guam</i> , District Court of Guam, Civil Case No. 02-00022.		
HHH	Decision and Order, dated July 23, 2004, and Decision and Order (on motions for reconsideration), dated September 9, 2004, <i>People of Guam v. Antonio M. Diaz</i> , Superior Court of Guam, Criminal Case No. CF 0050-03.		
III	Decision and Order, dated June 25, 2004, and Decision and Order (Motions to Reconsider), dated July 26, 2004, <i>People of Guam v. Rosie Tainatongo</i> , Superior Court of Guam, Criminal Case No. CF 0060-04.		


<u>EXHIBIT</u>	<u>DESCRIPTION</u>	<u>NOT ADMITTED</u>	<u>ADMITTED</u>
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JJJ	Decision Yan Otden, <i>Moylan v. Camacho</i> , Superior Court of Guam SP 230-03, dated November 10, 2003.		
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KKK	Declaration of Michael F. Phillips in Support of Petitioner's Response to Respondent Governor's Objection to Petitioner's Motion for Approval of Administration Plan, dated December 8, 2004, <i>Santos v. Camacho, Et al</i> , District Court of Guam Civil Case No. 04-00006.		
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Dated this 24<sup>th</sup> day of January, 2005.

OFFICE OF THE ATTORNEY GENERAL  
Douglas B. Moylan, Attorney General

  
STEPHEN A. COHEN  
ROBERT M. WEINBERG  
Assistant Attorneys General  
Attorney for Respondents